

**BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

DOCKET NO. 2020-125-E

Application of Dominion Energy South)	<u>UNITED STATES DEPARTMENT</u>
Carolina, Inc. for Adjustment of)	<u>OF DEFENSE AND ALL OTHER</u>
Rates and Charges (See Commission)	<u>FEDERAL EXECUTIVE</u>
Order No. 2020-13))	<u>AGENCIES' FOURTH SET OF</u>
)	<u>WRITTEN INTERROGATORIES</u>
)	<u>AND REQUEST FOR</u>
)	<u>PRODUCTION OF DOCUMENTS</u>
)	<u>AND THINGS TO DOMINION</u>
)	<u>ENERGY SOUTH CAROLINA, INC.</u>

Pursuant to the Public Service Commission's Regulation 103-833, the United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), by and through its legal counsel, hereby submits its Fourth Set of Written Interrogatories and Request for Production of Documents and Things to Dominion Energy South Carolina, Inc.

INSTRUCTIONS

1. Responses to these request should be provided within 20 days of this request in writing and under oath.
2. These Requests are continuing in nature and require supplemental answers within a reasonable time if additional documents or information would be responsive to these Requests.

3. If any of the responses do not contain complete information, so state this and identify each person who may have the additional information.

4. Due to mandated teleworking due to COVID-19, please deliver responses electronically to emilcy.w.medlyn.civ@mail.mil.

DEFINITIONS

1. “Company” is defined as Dominion Energy South Carolina, Inc.

2. “DESC” is defined as Dominion Energy South Carolina, Inc.

3. “DESS” is defined as Dominion Energy Southeast Services, Inc.

4. “DE” is defined as Dominion Energy

5. “Document” and “workpaper” shall have the broadest possible meaning and include, without limitation, the original and any non-identical copy (whether different from the original because of handwritten notes, underlining, or other marks,) regardless of origin or location, of written, typed, printed, or graphic matter (however produced or reproduced), and electrical or magnetic sound or video recordings, or transcriptions thereof, file or photographic prints, and all other writings or recordings of every kind and description, including, but not limited to, papers, letters, correspondence, agreements, contracts, telegrams, notes, notations, computer printouts, digital or e-mail communications, text messaging, data sheets, data processing cards or tapes, memoranda (including memoranda or memorials of conversations or meetings), intra-office communications, notebooks, reports, articles, books, pamphlets, periodicals, tables, charts, graphs, blueprints, drawings, studies, worksheets, estimating sheets, bids, bills, time cards, indices, lists, surveys, diaries, diary entries, facsimiles, specimens, models, schedules, accounts, invoices, purchase orders, estimates, ledgers, audits, and indices, and drafts, revisions or amendments of any

of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

6. “Identify” or “identity,” when referring to a natural person, shall mean to provide without limitation his or her full name, present or last-known address, telephone number, present or last-known business affiliation and location, and job titles and responsibilities during the applicable time covered by any response referring to such person.

7. “Identify” or “identity,” when referring to a document or writing, shall mean to give sufficient characterization of the document or writing so as to have identified it with reasonable particularity and shall include, without limitation, the following information with respect to such document or writing:

- a. The author and the sender of the document or writing;
- b. The date appearing on the document or writing, and if it has no date, the answer shall so state but shall give the date or approximate date the document or writing was prepared;
- c. The general nature or description of the document;
- d. The name of the person or persons, if any, to whom such document or writing was addressed and the names of other persons to whom the document or copies thereof were given or sent, if any;
- e. The name and address of the person having present possession, custody, or control of the document or writing.

DOCUMENT AND INFORMATION REQUESTS

DOD/FEA-DESC No. 4-1. Regina Elbert's testimony at page 13, starting at line 6 references four different groups with different ratios of operating and stewardship points and business unit financial points:

- (1) individual contributors with a 75/25 ratio,
- (2) supervisors and managers with a 65/35 ratio,
- (3) vice presidents and senior vice presidents with a 50/50 ratio, and
- (4) most senior leaders with financial ratios above 50%.

For each of these groups, please provide the following information:

- a. the total amount of costs incurred in the test year for (i) operating and stewardship goals and (ii) financial goals;
- b. the total amount of costs capitalized in the test year for (i) operating and stewardship goals, and (ii) financial goals;
- c. the total amount of costs expensed in the test year for (i) operating and stewardship goals, and (ii) financial goals;
- d. the total amount of costs included in the proposed revenue requirement in this case for recovery for (i) operating and stewardship goals, and (ii) financial goals.

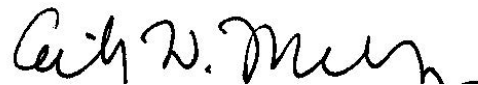
Please provide the above requested information for DESC, DESS and for any other costs allocated to the revenue requirement in this case.

DOD/FEA-DESC No. 4-2. Regarding stock or stock-based awards provided to the Board of Directors members, please provide the following information:

- (1) the amount included in operating expense in the test year, and
- (2) the amount included in the requested revenue requirement in this case.

DOD/FEA-DESC No. 4-3. Please confirm that all stock-based compensation has been removed from the requested revenue requirement in this case. If not, please provide the amount included in expense and the amount included in rate base.

Respectfully submitted,

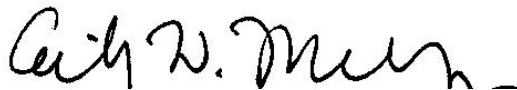


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October 14, 2020

CERTIFICATE OF SERVICE

I, Emily W. Medlyn, hereby certify that the foregoing document was served on all persons at the addresses listed in the Official Service List for Docket 2020-125-E on October 14, 2020.



Emily W. Medlyn